

TRACKITA PTY LTD: ANTI-BRIBERY & CORRUPTION (ABC) / ETHICAL CONDUCT POLICY

As an Australian consultancy engaging with government entities, Trackita Pty Ltd (“Trackita”) is committed to the highest standards of integrity and compliance with Australian laws. This Anti-Bribery & Corruption (ABC) / Ethical Conduct Policy sets forth our expectations regarding ethical behavior, and strictly forbids any acts of bribery or corrupt conduct in connection with our operations.

Important Notes:

1. This document is not part of any employment contract.
2. Trackita may revise or rescind this policy at any time.
3. Client Policies Supremacy: Where our government client’s policies differ or impose stricter requirements, the client’s policy prevails over Trackita’s guidelines.

1. Purpose & Scope

- Purpose: To ensure that Trackita’s personnel and partners understand and uphold Australia’s anti-corruption laws (including relevant provisions under the *Criminal Code Act 1995 (Cth)*), and to maintain the highest ethical standards when dealing with government entities and other stakeholders.
- Who Must Comply: All Trackita employees (full-time, part-time, and casual), contractors, subcontractors, suppliers, and any third parties acting on our behalf.

2. Definitions

- Bribery: Offering, giving, receiving, or soliciting anything of value (e.g., money, gifts, hospitality) with the intent to improperly influence a person in a position of trust or authority.
- Corruption: The abuse of entrusted power or position for private gain, potentially involving bribery, extortion, or other unethical conduct.
- Facilitation Payments: Small, “unofficial” payments made to expedite routine governmental actions—prohibited by Trackita and illegal under Australian law in most circumstances.

3. Prohibited Conduct

3.1 Bribery & Corruption

- Zero Tolerance: No Trackita personnel or representative is permitted to offer or accept bribes, or engage in corrupt activities, either in Australia or overseas.
- Gifts & Hospitality: Modest token gifts and hospitality may be acceptable if they are transparent and serve a legitimate business purpose. However, anything lavish or excessive may be construed as a bribe.

3.2 Facilitation Payments

- Strict Prohibition: Trackita does not allow facilitation payments, even if they are common practice in certain regions or industries.

3.3 Conflict of Interest

- Duty to Disclose: Employees must disclose potential or actual conflicts (e.g., personal relationships, financial interests) that could improperly influence decisions affecting Trackita or its government clients.

4. Acceptable Gifts & Benefits

- Nominal Value: Occasional low-value items (e.g., branded merchandise, modest meals) are typically acceptable.
- Approval: Any gift above a nominal value threshold *company to set internal figure* *company to set internal figure* requires written approval from a manager or senior executive.
- Compliance with Client Policy: If the government client enforces stricter rules on gifts and benefits, you must follow their policy.

5. Engaging Third Parties (Suppliers, Agents, Contractors)

- Due Diligence: Conduct appropriate checks before engaging third parties, ensuring they share our commitment to anti-corruption and Australian legal compliance.

- Contractual Obligations: All engagements should include ABC compliance clauses, specifying that violations can lead to termination of the contract and potential legal action.
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6. Reporting & Whistleblowing

- Obligation to Report: Employees must report any suspicious activities or potential violations of this policy.
 - How to Report: Concerns can be raised with a manager, Human Resources, or via Trackita's Whistleblower Policy.
 - Confidentiality & Non-Retaliation: Reports will be treated confidentially, and whistleblowers are protected under relevant Australian laws (e.g., the *Corporations Act 2001 (Cth)*).
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7. Training & Awareness

- Regular Training: All relevant employees and contractors will receive ongoing education on anti-bribery standards, detection of corruption, and the legal obligations for working with Australian government agencies.
 - Updates: Trackita will circulate updates to this policy and relevant legislative changes as needed.
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8. Enforcement & Disciplinary Actions

- Investigation: Alleged breaches will be investigated promptly and impartially.
 - Consequences: Violations may result in disciplinary action up to and including dismissal. Illegal activity may be referred to law enforcement authorities.
 - Client Requirements: If you are working under a government client's contract, their rules regarding investigative procedures and disciplinary measures may supersede Trackita's.
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9. Governance & Review

- Accountability: Senior management and the Board (or equivalent) oversee this policy's implementation and compliance.

- Annual Review: At least once a year, Trackita reviews this policy in light of legislative updates, operational changes, or new guidelines from government clients.
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10. Summary

Trackita maintains a zero-tolerance stance on bribery, facilitation payments, and any other corrupt practices. This policy ensures that all staff and associated parties understand their legal responsibilities under Australian law, particularly when engaging with government clients. By adhering to these standards, Trackita protects its reputation, maintains stakeholder trust, and upholds Australian public sector integrity.

For questions or clarifications regarding this policy, please contact your manager, HR department, or reference the Trackita Whistleblower Policy.